

**EXHIBIT 1**  
**OFFER OF JUDGMENT**



**KATHLEEN JENNINGS**  
ATTORNEY GENERAL

**DEPARTMENT OF JUSTICE**  
NEW CASTLE COUNTY  
820 NORTH FRENCH STREET  
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August 18, 2023

**Via Email**

Ronald G. Poliquin  
The Poliquin Firm LLC  
1475 South Governors Avenue  
Dover, DE 19904  
ron@poliquinfirm.com

RE: *Jonathan B. Guessford v. Corporal Stephen Douglas, et al.,*  
C.A. No. 23-185-MAK

Dear Ron:

Pursuant to Rule 68 of the Federal Rules of Civil Procedure, Defendants Corporal Stephen Douglas, Trooper Nicholas Gallo, and Master Corporal Raiford Box (“Defendants”) offer to allow Plaintiff Jonathan B. Guessford (“Plaintiff”) to take a judgment against them in this action for the total sum of \$50,000.00, inclusive of all fees and costs, for Plaintiff’s claims.

This Offer of Judgment shall be in full satisfaction of all federal and state law claims or rights that Plaintiff may have for damages, or any form of relief, arising out of the alleged acts or omissions of any defendant or official or agent of the State of Delaware.

This Offer of Judgment is made for the purposes specified in Rule 68 of the Federal Rules of Civil Procedure and is not to be construed as an admission of liability by any defendant, or any official, employee, or agent of the State of Delaware, or the Delaware Department of Safety and Homeland Security or Delaware State Police. This Offer of Judgment is not an admission that Plaintiff has suffered any damages, or that Defendants have caused Plaintiff any damages by any conduct alleged in Plaintiff’s controlling Complaint. *See* D.I. 3.

Acceptance of this Offer of Judgment will act to release and discharge Defendants and all past and present officials, employees, representatives and agents of the State of Delaware and the Delaware Department of Safety and Homeland Security and Delaware State Police from any and all claims that were or could have been alleged by Plaintiff in the above-referenced action.

This Offer of Judgment is made specifically according to the provisions of Rule 68 of the Federal Rules of Civil Procedure and will expire at the end of fourteen days as specified in Rule 68(a).

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Sincerely,

/s/ Nicholas D. Picollelli, Jr.

Nicholas D. Picollelli, Jr.